

Fact Sheet



For Final Significant Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Significant Modification, and shall be considered a supplement to the original Fact Sheet corresponding with the issuance of the initial Title V operating permit issued on January 22, 2007.

Permit Number: R30-00300026-2007(SM01)

Application Received: October 30, 2007

Plant Identification Number: 00300026

Permittee: Aker Plastics Company, Inc.

Mailing Address: 718 Mid Atlantic Parkway
Martinsburg, WV 25401

Permit Action Number: SM01 Revised: March 5, 2008

Physical Location:	Martinsburg, Berkeley County, West Virginia
UTM Coordinates:	762.31 km Easting • 4376.5 km Northing • Zone 17
Directions:	From I81 take exit 16E go to stop light make (L), make immediate (L) onto Mid Atlantic Parkway. Plant is located ½ mile on right.

Facility Modification Description

Aker Plastics Company Inc. is a fiberglass bath unit manufacturing facility operating under Standard Industrial Classification (SIC) Code 3088. The proposed modification reflects the facility's request to reduce potential hours of operation per year from 8760 hrs/yr to 6500 hrs/yr. As a result, hourly VOC and styrene limits were raised to correlate with the current amount of potential annual emissions based on material usage and normal controls operating. However, this modification also encompasses alternative emission limits that apply during periods of control equipment restoration. Therefore, the facility's annual potential to emit VOCs and HAPs will be increased depending on the amount of time spent operating under the alternative restoration control scenario. The alternative control scenario was permitted by minor source NSR permit R13-2006C, which limits operations in this alternative control mode to 180 days/yr in order to limit annual totals to below 250 tons of VOC.

Aker Plastics uses the open-mold technique to manufacture the bath units. The facility consists of four gel coat booths, two lamination areas, trim area, and finish area all of which vent to four parallel carbon wheel concentrators that are regenerated via the use of hot air and a regenerative thermal oxidizer (RTO). During normal operations the concentrator utilizes the four parallel carbon beds simultaneously to achieve 83% combined capture and destruction (concentrator/RTO) efficiency for styrene and VOC emissions. The proposed alternative that triggers when monitored efficiency drops below 83% will encompass taking at least one carbon bed offline to remove and replace the carbon adsorption media. The permittee is required to maintain at least 40% combined efficiency under this restoration scenario that was permitted by minor source NSR permit R13-2006C. This permit requires an initial Method 18 test to assure the alternative emission limits are not exceeded.

Emissions Modification Summary

Emissions Summary for emission Point ST1				
Criteria Pollutants	Potential Emissions		Change in Potential	
	lb/hr	ton/yr	lb/hr	ton/yr
Volatile Organic Compounds (VOC)	28.33	248	7.48	155.9
<i>PM₁₀ is a component of TSP.</i>				
Hazardous Air Pollutants	Potential Emissions		Change in Potential	
	lb/hr	ton/yr	lb/hr	ton/yr
Styrene	28.33	248	7.48	156.9

Some of the above HAPs may be counted as PM or VOCs.

Title V Program Applicability Basis

This facility has the potential to emit 248 tpy of styrene (a VOC). Due to this facility's potential to emit over 10 tons per year of styrene and over 25 tons per year of aggregate HAPs, Aker Plastics Company Inc is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:

45CSR13	The Secretary can request any pertinent information such as annual emission inventory reporting.
WV Code § 22-5-4 (a) (14)	
45CSR30	Operating permit requirement.

State Only:	45CSR4	No objectionable odors.
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Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR15, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-2006C	04-10-2007	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B" which may be downloaded from DAQ's website.

Determinations and Justifications

A number of typos were found and fixed in the original permit. These corrections are marked appropriately in the proposed draft Title V document.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

- a. During the approval of minor source NSR permit number R13-2006C the changes incorporated by this proposed Title V permit were evaluated for PSD applicability under 45CSR14. It was determined that if Aker Plastics Company can remain below 250 TPY of VOC the source will not be subject to permitting requirements of the PSD program.

Request for Variances or Alternatives

None

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: January 15, 2008
Ending Date: February 14, 2008

All written comments should be addressed to the following individual and office:

Jesse Hanshaw
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Point of Contact

Jesse Hanshaw
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1216 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

No comments were received.